

JAN 20 1994

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION

WILLIAM J. KANAK - Clerk

By: \_\_\_\_\_ Deputy

UNITED STATES OF AMERICA	)	
	)	No. CR 94-2
Plaintiff,	)	
	)	INDICTMENT
vs.	)	
	)	18 U.S.C. § 1111
RONALD W. DOWNS, SR.,	)	18 U.S.C. § 1114
	)	18 U.S.C. § 924(c)
Defendant.	)	26 U.S.C. § 5841
	)	26 U.S.C. § 5861(d)
	)	26 U.S.C. § 5871
	)	18 U.S.C. § 924(d)(1)
	)	26 U.S.C. § 5872(a)

The Grand Jury charges:

Count 1

On or about January 14, 1994, in the Northern District of Iowa, RONALD W. DOWNS, SR., while lying in wait and maliciously, deliberately, willfully and with premeditation and malice aforethought, did shoot and kill Gloria Heising, an employee of the United States Postal Service, while she was engaged in the performance of her official duties.

This is in violation of Title 18, United States Code, Sections 1111 and 1114.

Count 2

On or about January 14, 1994, in the Northern District of Iowa, RONALD W. DOWNS, SR., did knowingly use and carry firearms, specifically, a Charter Arms .44 caliber revolver, serial number

826063 and a short barreled, Harrington & Richardson .410 gauge, single shot shotgun having an overall length of less than 26 inches and bearing no serial number, during and in relation to a federal crime of violence for which he may be prosecuted in a court of the United States, that is, murder as charged in Count 1.

This is in violation of Title 18, United States Code, Section 924(c).

Count 3

On or about January 14, 1994, in the Northern District of Iowa, RONALD W. DOWNS, SR. did knowingly possess a firearm, that is, a short barreled shotgun made from an Harrington & Richardson .410 gauge shotgun, having an overall length of less than 26 inches and bearing no serial number, which was not registered to him in the National Firearms Registration Transfer Record.

This is in violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

Count 4

Forfeiture

Based upon the foregoing charges the following firearms and ammunition are forfeited to the United States:

Charter Arms .44 caliber revolver,  
serial number 826063

Short barreled Harrington & Richardson  
.410 gauge, single shot shotgun having an  
overall length was less than 26 inches and no  
serial number

Numerous .44 special cartridges


Forfeiture of the above listed items is pursuant to Title  
18, United States Code, Section 924(d)(1) and Title 26, United  
States Code, Section 5872(a).

A TRUE BILL

s/Foreperson

 Foreman

1-20-94  
Date

  
PATRICK J. REINERT  
Assistant United States Attorney